

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

*All Cases Noted on Attached Appendix A*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**STIPULATION AND ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO TRIBAL SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Tribal Plaintiffs identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and Defendants Walgreen Co., Walgreens Boots Alliance, Inc., WAGDCO LLC, Walgreen Eastern Co., Inc., Walgreens Mail Service, LLC, Walgreens Specialty Pharmacy, LLC, Walgreens.com, Inc., Walgreens of Massachusetts, LLC, Walgreen Louisiana Co., Inc., Walgreen Pharmacy Services Midwest LLC, Walgreen Arizona Drug Co., Walgreen of Puerto Rico, Inc., Walgreen of San Patricio, Inc., SAJ Distributors and Duane Reade, Inc. (collectively and together with Released Entities, the “Walgreens Defendants”<sup>1</sup>) that, pursuant to the election of each Dismissing Plaintiff to participate in the Walgreens Settlement Agreement, dated December 27, 2022, which is binding on the Dismissing Plaintiffs and the Walgreens Defendants, and which has an Effective Date of February 24, 2023 (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against any Walgreens Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Walgreens Settlement Agreement to the extent provided under that Agreement.

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<sup>1</sup> The Released Entities are each and every entity that is a “Released Entity” as set forth in Section I.25 of the Walgreens Settlement Agreement, dated as of December 27, 2022, a copy of which is attached as Appendix B.

Date: February 24, 2023

Agreed as to form and substance:

*For the Tribal Leadership Committee*

/s/ Lloyd Miller

Lloyd Miller / Don Simon / Whitney  
Leonard  
Sonosky, Chambers, Sachse, Miller &  
Monkman, LLC

/s/ Lynn Sarko

Lynn Sarko  
Keller Rohrbach, LLP

/s/ Tim Purdon

Tara Sutton / Tim Purdon  
Robins Kaplan LLP

/s/ T. Roe Frazer

Roe Frazer  
Frazer PLC

/s/ Peter Mougey

Peter Mougey  
Levin Papantonio Raftery

/s/ Scott Gilbert

Scott Gilbert  
Gilber LLP

/s/ Elizabeth J. Cabraser

Elizabeth J. Cabraser / Dan Drachler /  
Eric B. Fastiff  
Lieff Cabraser Heimann & Bernstein  
LLP

/s/ Geoffrey Strommer

Geoffrey Strommer / Caroline Mayhew /  
Edmund Goodman  
Hobbs, Straus, Dean & Walker, LLP

/s/ Steve Skikos

Jane Joseph / Steve Skikos  
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*For Walgreens*

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SO ORDERED this 3/2/23

/s/Dan Aaron Polster  
Hon. Dan Aaron Polster  
United States District Judge